

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

KEN JOHANSEN, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

LIBERTY MUTUAL GROUP, INC.; and
SPANISH QUOTES, INC. d/b/a
WESPEAKINSURANCE,

Defendants,

LIBERTY MUTUAL GROUP, INC.,

Crossclaimant,

v.

SPANISH QUOTES, INC. d/b/a
WESPEAKINSURANCE,

Crossdefendant,

LIBERTY MUTUAL GROUP, INC.,
LIBERTY MUTUAL INSURANCE
COMPANY,

Third-party Plaintiffs,

v.

PRECISE LEADS, INC., and DIGITAS, INC.,

Third-party Defendants

Civil Action No. 1:15-cv-12920-ADB

STIPULATION OF DISMISSAL

Plaintiff Ken Johansen (“Plaintiff”), Defendant Spanish Quotes, Inc. d/b/a WeSpeakInsurance (“Spanish Quotes”), Defendant and Third Party Plaintiff Liberty Mutual Group Inc. (“LMG”), Third Party Plaintiff Liberty Mutual Insurance Company (“LMIC” and collectively with LMG, “Liberty”), Third Party Defendant Precise Leads, Inc. (“Precise Leads”), and Third-Party Defendant Digitas, Inc. (“Digitas”), by and through their undersigned attorneys and pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), hereby stipulate as follows:

1. Plaintiff's claims against Spanish Quotes and LMG are dismissed, with prejudice, without interest, attorneys' fees or costs, and with all parties waiving rights of appeal concerning the claims dismissed pursuant to this Stipulation and rights pursuant to Fed. R. Civ. P. 60;
2. LMG's Counterclaim against Spanish Quotes, Liberty's Third Party Complaint against Precise Leads and Digitas, and Precise Leads' Counterclaim against LMIC shall not be subject to this Stipulation, but shall continue in the litigation and all rights of appeal, interest and attorneys' fees or costs related thereto for all parties are preserved and are not waived;
3. This dismissal terminates the litigation for purposes of the Escrow Agreement, dated as of April 18, 2016, between Boston Private Bank & Trust Company and Digitas;
4. Plaintiff shall be awarded \$4,800.00 in costs; and
5. The dismissal of Plaintiff's claims does not prejudice the rights of putative class members described in the Complaint herein.

DATED: May 30, 2018

Respectfully submitted,

KEN JOHANSEN, individually and on behalf of all
others similarly situated

By his attorneys,

/s/ Edward A. Broderick

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CERTIFICATE OF SERVICE

I, Edward A. Broderick, hereby certify that the foregoing document was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on May 30, 2018.

/s/ Edward A. Broderick
Edward A. Broderick